

Facility Name: **Dougherty County Fleming/Gaissert Road MSW Landfill**
City: Albany
County: Dougherty
AIRS #: 04-13-095-00095

Application #: TV-455259
Date Application Received: March 23, 2020
Permit No: 4953-095-0095-V-05-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Dougherty County Fleming/Gaissert Road MSW Landfill

2. Parent/Holding Company Name

Dougherty County

3. Previous and/or Other Name(s)

Fleming/Gaissert Road Landfill

4. Facility Location

900 Gaissert Road
Albany, Georgia 31705
Dougherty County

5. Attainment, Non-attainment Area Location, or Contributing Area

The Facility is located in Dougherty County, which is an attainment area for all pollutants regulated under the National Ambient Air Quality Standards (NAAQS).

B. Site Determination

The following two landfills are owned and operated by Dougherty County at this location:

- Fleming/Gaissert Road Municipal Solid Waste landfill
- Fleming/Gaissert Road Construction and Demolition Landfill

The MSW landfill is the primary disposal Facility for residential and commercial solid waste generated in Dougherty County and the city of Albany. The county also accepts C & D material at its landfill, which is diverted to the Fleming/Gaissert Road Construction and Demolition Landfill.

EPD has determined that the two above named landfill sites are one site under Title V, because of the following:

1. Contiguous/adjacency: Both the sites are located at 900 Gaissert Road in Albany. The facilities are clearly contiguous and adjacent.
2. Common control: The ownership and management of both sites is by Dougherty County and therefore is under common control.

3. Both sites belong to the same industrial grouping/classification since they have the same first two digits in the SIC code.

C. Existing Permits

Table 1 below lists all current permits (including Part 70 permits), as amended, issued to the Facility.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/Effectiveness	Purpose of Issuance
4953-095-0095-V-04-0	February 9, 2017	Title V Renewal

D. Process Description

1. SIC Codes(s)

4953

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the Facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this Facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The landfill receives and disposes of general solid waste. Decomposition of the deposited waste generates landfill gas (LFG) consisting of about 45% methane, 55% carbon dioxide and small amounts of non-methane organic compounds (NMOC). The LFG is collected using wells in a gas collection and control system (GCCS) and is piped to a nearby gas to electricity (GTE) power plant at the Marine Corps Logistics Base (MCLB) or sent to a flare (Triton Candle Flare CF-2100).

3. Overall Facility Process Description

The Dougherty County Fleming/Gaissert Road MSW Landfill ("the Facility") receives, manages, and disposes of solid waste, including, but not limited to, municipal solid waste, commercial waste, construction and demolition (C & D) waste and industrial waste. The landfill has a design capacity of 6.02 million cubic meters (7,875,000 cubic yards) and was last modified on March 10, 1999. Tier 2 testing was conducted on February 9, 2021 indicating a NMOC concentration of 200 ppm as hexane and a NMOC emission rate of 22.52 Mg for 2020 (21.9 Mg for 2021).

A voluntary gas collection and control system (GCCS) has been operated to control explosive gas migration and to mitigate impacts of LFG on groundwater. On October 18, 2010 the Facility was

issued a permit to expand the existing voluntary GCCS to include landfill cells 8, 10 and 12 in the active portion of the landfill and to construct a gas pipeline to the Marine Corp Logistics Base (MCLB) to sell landfill gas to a GTE Facility at the base. The existing flare continues to serve as a backup control device during times the GTE Facility is off-line due to maintenance and repairs. Emissions from the landfill of NMOC and methane are more effectively controlled due to the expansion of the GCCS. Emissions from the flare are expected to increase as additional landfill area, with its additional LFG, comes under GCCS expansion.

4. Overall Process Flow Diagram

The Facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Dougherty County Fleming/Gaissert Road MSW Landfill is a minor source with respect to PSD/NSR regulations. Emissions of each PSD regulated pollutant is less than the major source threshold of 250 tons per year. Landfills are not included in the list of 28 source categories that have a 100 tpy threshold to be subject to PSD regulations. Potential to Emit emissions as reported in Application No. 455259 (using the capacity of the backup flare):

Pollutant	Tons /Year
CO	104
NO _x	19
SO ₂	33
PM	15
PM _{2.5}	7
THAP	13
VOC	21

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the Facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Yes			✓
PM ₁₀	Yes			✓
PM _{2.5}	Yes			✓
SO ₂	Yes			✓
VOC	Yes			✓
NO _x	Yes			✓
CO	Yes	✓		

Pollutant	Is the Pollutant Emitted?	If emitted, what is the Facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
TRS	Yes			✓
H ₂ S	No			✓
Individual HAP	Yes			✓
Total HAPs	Yes			✓

3. MACT Standards

40 CFR 63, Subpart AAAA – “National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills”

§ 63.1935 Am I subject to this subpart?

[Beginning September 27, 2021,] You are subject to this subpart if you meet the criteria in paragraph (a) or (b) of this section.

- (a) You are subject to this subpart if you own or operate an MSW landfill that has accepted waste since November 8, 1987, or has additional capacity for waste deposition and meets any one of the three criteria in paragraphs (a)(1) through (3) of this section:
- (1) Your MSW landfill is a major source as defined in § 63.2 of subpart A.
 - (2) Your MSW landfill is collocated with a major source as defined in § 63.2 of subpart A.
 - (3) Your MSW landfill is an area source landfill that has a design capacity equal to or greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³) and has estimated uncontrolled emissions equal to or greater than 50 megagrams per year (Mg/yr) NMOC as calculated according to §63.1959.

Dougherty County Fleming/Gaissert Road MSW Landfill is not a major source of HAP, co-located with a major source of HAP, nor has estimated uncontrolled emissions of NMOC greater than or equal to 50 megagrams per year (Mg/yr) (NMOC emission rate of 22.52 Mg for 2020) and is not a bioreactor [63.1935(b)]; therefore, the landfill is not subject to Subpart AAAA.

The landfill will become subject to the Subpart AAAA if the NMOC emissions equate to or exceed 50 megagrams per year, or if the landfill begins adding liquids, other than leachate, in a controlled fashion to the waste mass, and becomes a bioreactor (defined in 63.1990).

40 CFR 61 Subpart M – NESHAP for Asbestos

The landfill is subject to 40 CFR Part 61 Subpart M – NESHAP for Asbestos because the landfill may dispose of asbestos-containing materials. As long as the landfill remains active, it will be required to comply with the provisions of 40 CFR 61.154 – “Standard for Active Waste Disposal Sites”, including all reporting and record keeping requirements. Upon closure, the Facility will then be required to comply with 40 CFR 61.151 – “Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations.”

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	N
Program Code 8 – Part 61 NESHAP	Y
Program Code 9 - NSPS	Y
Program Code M – Part 63 NESHAP	N
Program Code V – Title V	Y

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

40 CFR 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills

§60.750: Applicability, designation of affected Facility, and delegation of authority.

- (a) The provisions of this subpart apply to each municipal solid waste landfill that commenced construction, reconstruction, or modification on or after May 30, 1991, but before July 18, 2014.
- (d) An affected municipal solid waste landfill must continue to comply with this subpart until it:
 - 1) Becomes subject to the more stringent requirements in an approved and effective state or federal plan that implements subpart Cf of this part, or
 - 2) Modifies or reconstructs after July 17, 2014, and thus becomes subject to subpart XXX of this part.

The landfill is not subject to NSPS WWW because it is subject to the more stringent requirements in Federal Operating Plan OOO and will be subject to Georgia Rule (ggg) that implements Subpart Cf once the state plan is approved by EPA.

40 CFR 60 Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills That commenced Construction, Reconstruction, or Modification After July 17, 2014

The provisions of Subpart XXX apply to each MSW landfill that commenced construction, reconstruction, or modification after July 17, 2014. Dougherty County Fleming/Gaissert Road MSW Landfill is not subject to Subpart XXX because it was constructed and modified prior to July 17, 2014 and has not been reconstructed or modified since.

40 CFR 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 2014.

§62.16711: Designated facilities.

- (a) The designated Facility to which this subpart applies is each municipal solid waste landfill in each state, protectorate, and portion of Indian country that meets the conditions of paragraphs (a)(1) and (2) of this section, except for landfills exempted by paragraphs (b) and (c) of this section.
 - 1) The municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014.
 - 2) The municipal solid waste landfill has accepted waste at any time since November 8, 1987, or the landfill has additional capacity for future waste deposition.

- (b) A municipal solid waste landfill regulated by an EPA-approved and currently effective state or tribal plan implementing 40 CFR 60, subpart Cf, is not subject to the requirements of this subpart.

This Federal Operation Plan OOO is applicable to each municipal solid waste landfill that has a design capacity greater than 2.5 million megagrams (Mg) or 2.5 million cubic meters (m³). Dougherty County Fleming/Gaissert Road MSW Landfill has a design capacity exceeding 2.5 million cubic meters. The landfill is subject to Federal Plan OOO because it commenced construction before July 17, 2014, has not been modified or reconstructed since July 2012 (modified March 10, 1991), has accepted waste since November 8, 1987, and is not subject to an EPA-approved state plan. Once Georgia Rule (ggg) is an EPA-approved state plan, the landfill will no longer be subject to Federal Plan OOO.

The NMOC emission rate must be recalculated annually, except as provided in §62.16724(c)(3) and submit an annual NMOC emission rate report according to 62.16724(c) until such time as the calculated NMOC emission rate is equal to or greater than 34 Mg per year or the landfill closes. If the calculated NMOC emission rate is equal to or greater than 34 Mg, the owner must either comply with 62.16714(b) or (c), calculate NMOC emissions using the next higher tier, or conduct a surface emission monitoring demonstration using the procedures specified in 62.1678(a)(6). If the landfill is permanently closed, a closure report must be submitted. If calculated NMOC emission rate is equal to or greater than 34 Mg using Tier 1, 2, or 3, the owner must submit a collection and control system design plan within 1 year or conduct surface monitoring.

Startup of a MSW landfill air emission collection and control equipment that is capable of meeting the emission standards of § 62.16714 must be completed within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year, or if Tier 4 surface emissions monitoring (SEM) shows a surface emission concentration of 500 parts per million methane or greater.

Currently, the NMOC emission rate calculation using Tier 2 remains below the Subpart OOO threshold of 34 Mg per year; a landfill gas collection and control system (GCCS) is not required to be installed (Tier 2 testing at the Facility on February 9, 2021 indicates that the NMOC emission rate is 25.52 megagrams per year for 2020). Therefore, the GCCS at the landfill is voluntary and not required by regulation.

40 CFR 61 Subpart M – NESHAP for Asbestos

Dougherty County Fleming/Gaissert Road MSW Landfill is allowed to accept asbestos-containing waste. If the Facility accepts asbestos waste for disposal, the Facility will be subject to the asbestos NESHAP in 40 CFR 61, Subpart M. As long as the landfill remains active, it is required to comply with the provisions of 40 CFR 61.154 – “Standard for Active Waste Disposal Sites”, including all reporting and record keeping requirements. Upon closure, the landfill will be required to comply with 40 CFR 61.150 – “Standard for waste disposal for manufacturing, fabricating, demolition, renovation, and spraying operations,” if construction and demolition waste has been accepted.

40 CFR 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984

The capacities of the leachate storage tanks of the landfill are more than 151 m³; however, the leachate vapor pressure is similar to water and thus well below the threshold of 3.5 kPa. Therefore, NSPS 40 CFR 60, Subpart Kb apply applicable to the leachate storage tanks.

Proposed Georgia Rule (ggg) Existing Municipal Solid Waste Landfills

The provision of this subparagraph [Rule 391-3-1-.02(2)(ggg)] are applicable **AFTER** the approval of Georgia's state plan implementing the revised Emissions Guidelines for existing MSW Landfills (40 CFR Part 60 Subpart Cf). Currently, Rule (ggg) is not an EPA approved state plan and does not apply to the landfill; however, Rule (ggg) often cites 40 CFR 60 Subpart Cf and both are comparable to the Federal Operating Plan OOO. Rule (ggg) and Federal Operating Plan OOO are incorporated into the Permit. Therefore, when Rule (ggg) becomes an approved plan, the Permit will not require amending.

The provisions of this subparagraph apply to each existing municipal solid waste landfill that commenced construction, reconstruction, or modification on or before July 17, 2014 and has either accepted waste at any time since November 8, 1987 or has additional design capacity available for future waste deposition.

The owner or operator of a MSW landfill subject to this subparagraph with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters is subject to the requirements to obtain a Part 70 operating permit.

Each owner or operator of an MSW landfill shall calculate an initial NMOC emission rate for the landfill using the procedures specified in §60.35f(a). The NMOC emission rate must be recalculated annually, except as provided in § 60.38f(c)(3).

- 1) If the calculated NMOC emission rate is less than 34 megagrams per year, the owner or operator must:
 - a) Submit an annual NMOC emission rate report according to §60.38f(c), except as provided in §60.38f(c)(3); and
 - b) Recalculate the NMOC emission rate annually using the procedures specified in § 60.35f(a) until such time as the calculated NMOC emission rate is equal to or greater than 34 megagrams per year, or the landfill is closed.
- 2) If the calculated NMOC emission rate is equal to or greater than 34 megagrams per year using Tier 1, 2, or 3 procedures, the owner or operator must either: submit a collection and control system design plan prepared by a professional engineer to the Administrator within 1 year as specified in §60.38f(d), except for exemptions allowed under §60.31f(e)(3); calculate NMOC emissions using a higher tier in §60.35f; or conduct a surface emission monitoring demonstration using the procedures specified in §60.35f(a)(6).

Rule (ggg) requires a landfill to collect and control MSW landfill emissions if the following:

- 1) The landfill has an NMOC emission rate greater than or equal to 34 megagrams per year or Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.
- 2) The landfill in the closed landfill subcategory and has an NMOC emission rate greater than or equal to 50 megagrams per year or Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.

Installation and start up of the collection and control system that captures the gas generated within the landfill must occur within 30 months after:

- 1) The first annual report in which the NMOC emission rate equals or exceeds 34 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 34 megagrams per year, as specified in §60.38f(d)(4); or
- 2) The first annual NMOC emission rate report for a landfill in the closed landfill subcategory in which the NMOC emission rate equals or exceeds 50 megagrams per year, unless Tier 2 or Tier 3 sampling demonstrates that the NMOC emission rate is less than 50 megagrams per year, as specified in §60.38f(d)(4); or
- 3) The most recent NMOC emission rate report in which the NMOC emission rate equals or exceeds 34 megagrams per year based on Tier 2, if the Tier 4 surface emissions monitoring shows a surface methane emission concentration of 500 parts per million methane or greater as specified in §60.38f(d)(4)(iii).

Planning, awarding of contracts, installing, and starting up MSW landfill air emission collection and control equipment that is capable of meeting the Emission Guidelines under § 60.33f must be completed within 30 months after the date an NMOC emission rate report shows NMOC emissions equal or exceed 34 megagrams per year (50 megagrams per year for the closed landfill subcategory); or within 30 months after the date of the most recent NMOC emission rate report that shows NMOC emissions equal or exceed 34 megagrams per year (50 megagrams per year for the closed landfill subcategory), if Tier 4 surface emissions monitoring shows a surface emission concentration of 500 parts per million methane or greater.

C. Compliance Status

The Facility permit application did not indicate any non-compliance issue.

D. Permit Conditions

Permit Condition 2.2.1 establishes the applicability of 40 CFR 62 Subparts A and OOO to the landfill.

Permit Condition 2.2.2 establishes the applicability of 40 CFR 61 Subparts A and M to the landfill.

Permit Condition 2.2.3 establishes the potential applicability of 40 CFR 63 Subparts A and AAAA to the landfill.

Permit Condition 2.3.1 establishes applicability of Rule (ggg) once the state plan is approved by EPA.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
0001	Landfill	40 CFR 62, Subpart A 40 CFR 62, Subpart OOO 40 CFR 61, Subpart A** 40 CFR 61, Subpart M** 40 CFR 63, Subpart A*** 40 CFR 63, Subpart AAAA*** 391-3-1-.02(2)(n)	2.2.1, 2.2.2, 2.2.3, 2.3.1, 3.3.1, 3.4.2, 3.4.3, 4.2.1, 4.2.2, 4.2.3, 4.2.4, 4.2.5, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16	None	None

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards and corresponding permit conditions are intended as a compliance tool and may not be definitive.

** 40 CFR 61 requirements are potentially applicable, if the Facility accepted asbestos containing industrial waste.

*** 40 CFR 63 requirements are not currently applicable, but could become applicable during the permit term if the Facility is required to install a GCCS or becomes a bioreactor.

B. Equipment & Rule Applicability

Emission and Operating Caps:

Not Applicable.

Rules and Regulations Assessment:

40 CFR 62 Subpart OOO – Federal Plan Requirements for Municipal Solid Waste Landfills That Commenced Construction On or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014

Since this municipal solid waste landfill commenced construction, reconstruction, or modification on or before July 17, 2014 and has accepted waste since November 8, 1987, it is subject to 40 CFR 62 Subpart OOO. This regulation establishes emission control requirements and compliance schedules for designated pollutants from certain designated municipal solid waste (MSW) landfills in accordance with section 111(d) of the Clean Air Act and subpart B of 40 CFR part 60. The Permittee is required to install a GCCS in accordance with the timelines of Subpart OOO if NMOC emission rate equals or exceeds 34 megagrams per year. The Permittee is exempt from the requirement to submit an annual NMOC emission rate report after a GCCS meeting the design criteria of 40 CFR 62 Subpart OOO has been installed, during such time as the GCCS is in operation and in compliance with the applicable Subpart OOO requirements.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Emissions

This rule requires the Facility to minimize fugitive dust from the Facility. This includes using water or chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering at all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material on dirt roads, materials, stockpiles, and other similar

surfaces. Also per this rule, a landfill may not discharge fugitive dust, which exhibits opacity equal to or greater than 20 percent.

C. Permit Conditions

Permit Condition 3.4.1 sets Georgia Rule (e) particulate matter standards from any industrial process at the Facility.

Permit Conditions 3.4.2 and 3.4.3 limit fugitive dust and its opacity, in accordance with Georgia Rule(n).

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Permit Condition 4.2.1 states that the Facility must determine the NMOC emission rate using the equations in Permit Condition 4.2.2 and constants in Permit Condition 4.2.3.

Permit Condition 4.2.4 states the sampling procedures to be followed for collecting samples to determine NMOC concentration when using Tier 2 or Tier 3 values for calculating NMOC emissions.

Permit Condition 4.2.5 requires the Facility to conduct testing to determine the site-specific NMOC concentration using the procedures specified in Condition 4.2.4 no later than February 9, 2026.

Permit Condition 4.2.6 details the procedures for conducting the surface methane measurements using tier 4 testing, only if both Tier 1 and Tier 2 indicate NMOC emissions are greater than or equal to 34 Mg/yr but less than 50 Mg/yr.

Permit Condition 4.2.7 contains instrumentation specifications and procedures for surface emission monitoring devices.

2. Equipment Groups (all subject to the same test requirements):

Not Applicable.

V. Monitoring Requirements**A. General Monitoring Requirements**

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements**1. Individual Equipment:**

Not Applicable.

2. Equipment Groups (all subject to the same monitoring requirements):

Not Applicable.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Landfill regulation 40 CFR 62 Subpart OOO requires the Permittee to submit an estimate of NMOC emissions in an NMOC emission rate report according to § 62.16724(c) and recalculate the NMOC mass emission rate annually as required under § 62.16714(e). If the NMOC emissions exceed 34 megagrams per year, the landfill must either calculate emissions at a higher tier (e.g., move from Tier 2 to Tier 3) or submit a Collection and Control System (GCCS) Design Plan that has been prepared by a Professional Engineer. Subpart OOO requires the landfill to keep accessible records of design capacity and waste in place and may exclude areas containing nondegradable waste from the GCCS if sufficient records are kept.

Landfills that accept asbestos-containing waste are subject to 40 CFR 61 Subpart M. These landfills are required to comply with 40 CFR 61.154 and, upon closure, submit records of asbestos disposal locations and quantities.

Permit Conditions 6.2.1 through 6.2.3 include the requirements for submitting annual NMOC emission rate reports and the procedures to be taken when a NMOC emission rate report exceeds 50 megagrams per year (i.e., calculate emissions by a higher tier or submit a GCCS design plan).

Permit Condition 6.2.4 states that a NMOC emission report is not required after a GCCS, which meets the requirements of Subpart OOO, has been installed.

Permit Condition 6.2.5 requires that the Facility keep records of the maximum design capacity of the landfill, the current amount of solid waste in place, and the year-by-year waste acceptance rate.

Old Permit Condition 6.2.6 contains requirements for excluding areas of the landfill from the GCCS design when it is required, which contain nondegradable waste. Old Permit Condition 6.2.6 becomes Permit Condition 6.2.8.

Old Permit Conditions 6.2.7 and 6.2.8 contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepts asbestos-containing waste. Old Permit Condition 6.2.7 becomes Permit Condition 6.2.6 and Old Permit Condition 6.2.8 becomes Permit Condition 6.2.7.

Permit Condition 6.2.9 contains an allowance for excluding any nonproductive area of the landfill from the GCCS design. The Permittee may exclude an area if an NMOC emission from that area is less than 1 percent of the landfill's total NMOC emissions.

Old Permit Condition 6.2.10 requires the Facility to notify the Division when there is any increase in the design capacity of the landfill. Old Permit Condition 6.2.10 becomes Permit Condition 6.2.21.

Permit Conditions 6.2.11 through 6.2.13 contain requirements which are applicable, if the landfill adds any liquid (other than leachate) to the landfill. The landfill may become subject to the bioreactor requirements in 40 CFR 63 Subpart AAAA if liquids (other than leachate) are added.

Old Permit Condition 6.2.14 requires implementing their dust suppression plan to ensure that the landfill complies with Georgia Rule (n). Old Permit Condition 6.2.14 becomes Permit Condition 6.2.10.

Old Permit Condition 6.2.15 requires a report when the landfill stops accepting waste in order to close the landfill. Old Permit Condition 6.2.15 becomes Permit Condition 6.2.14.

New Permit Condition 6.2.15 requires the Facility to submit a Leachate Addition Report to the Division and to EPA annually, if the Permittee has employed leachate recirculation or add liquids other than leachate within the last 10 years.

Old Permit Condition 6.2.16 requires the Facility to record the date, and amount of landfill gas flared, and the date, and quantity of LFG delivered to the GTE plant at the nearby MCLB. This information can be used to calculate actual emissions from the landfill flare. Old Permit Condition 6.2.16 becomes Permit Condition 6.2.22.

New Permit Condition 6.2.16 requires the Facility to keep records should the Permittee be required to report per Permit Condition 6.2.15.

New Permit Condition 6.2.17 allows the Permittee to elect Tier 4 testing to comply with specific surface methane emissions if the NMOC emission rate report submitted in compliance with 6.2.1 is greater than or equal to 34 megagrams per year but less than 50 megagrams per year.

New Permit Condition 6.2.18 requires the Permittee to provide a notification of the date(s) upon which the Permittee intends to conduct the Tier 4 measurements, including any delays that may surface due to weather conditions.

New Permit Condition 6.2.19 requires the Permittee keep for at least 5 years up-to-date, readily accessible records of all surface emissions monitoring and information related to monitoring instrument calibrations conducted.

New Permit Condition 6.2.20 requires the Permittee submit reports specified in Condition 6.2.15 or 6.2.17, along with all subsequent reports, to EPA via the CEDRI by the deadlines specified in this permit, regardless of the method.

VII. Specific Requirements**A. Operational Flexibility**

Other than the standard conditions (7.1.1, 7.2.1, and 7.2.2), operational flexibility provisions have not been incorporated into this Title V Permit. The applicant did not include any alternative operating scenarios in their Title V Application or request any specific operational flexibility conditions.

B. Alternative Requirements

There are no alternative requirements that need to be incorporated into the Title V Permit.

C. Insignificant Activities

See Permit Application on GEOS website.
See Attachment B of the permit

D. Temporary Sources

The Facility did not apply for a permit for any temporary sources.

E. Short-Term Activities

When the following activities occur, the Permittee is required to maintain records relating to these activities:

- a) Cell Closure Construction: 3 to 9 months duration after 2 to 3 years after start of filling of the cell.
- b) Cell Construction: 3 to 9 months duration once every 2 to 4 years.
- c) Gas Collection and Control System Construction – Expansion of existing GCCS: 3 to 6 months once every 2 to 4 years.

F. Compliance Schedule/Progress Reports

The Facility is in compliance with all Air Quality Regulations. Therefore, no compliance schedule or progress reports are necessary.

G. Emissions Trading

The Facility is not involved in any emissions trading programs.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

The Facility is subject to the Stratospheric Ozone Protection Requirements under Title VI of the CAAA of 1990. The Facility has stated in their application that they are subject to 40 CFR 82, Subpart A, Appendices A and B. The Facility is also subject to 40 CFR 82, Subpart F - Recycling and Emissions Reduction.

J. Pollution Prevention

There is no pollution prevention requirements in this Title V permit.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//